

**IN THE U.S. DISTRICT COURT FOR MARYLAND,
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC.)	
)	
Plaintiff)	
v.)	Case No.PJM 08 cv 0921
)	
WORLD AVENUE USA, LLC, et al.)	
Defendants)	
_____)	

JOINT REQUEST FOR MODIFICATION OF THE SCHEDULING ORDER

Pursuant to the Order issued on April 28, 2009, Plaintiff, Beyond Systems, Inc. and Defendant, World Avenue USA, LLC, through their undersigned counsel, respectfully request the Court modify the deadlines set forth in the Pretrial Scheduling Order. In particular, Plaintiff and Defendant request that the Court extend the discovery cutoff date by four (4) months to January 10, 2010. The remaining dates have been accordingly adjusted by eight (8) weeks to maintain the time originally allocated by the Court for a particular discovery procedure.

In support of this request, Plaintiff and Defendant represent to the Court that the discovery in this matter will be complex, will involve significant amounts of electronically stored information and will require discovery to be taken from numerous third party witnesses, including third party witnesses located outside of the United States.

Due to prior commitments of counsel involving trial and out of town travel, the parties conferred and agreed to meet during the week of May 25, 2009 to discuss the discovery of electronically stored information.

The new deadlines respectfully requested by the parties are as follows:

Deadline for request for modification of initial Scheduling Order	May 5, 2009
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Joint request for early settlement/ADR conference (This request will not postpone discovery unless otherwise ordered.)	May 12, 2009
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Initial report whether there is unanimous consent to proceed before a United States Magistrate Judge	May 12, 2009
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Deadline for conference re discovery of electronically stored information. (If either or both parties intend to take such discovery, before the conference counsel should review the Suggested Protocol for Discovery of Electronically Stored Information prepared by a joint bench/bar committee published on the court's website.)	May 26, 2009
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Moving for joinder of additional parties and amendment of pleadings	August 7, 2009
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Plaintiff's Rule 26(a)(2) disclosures re experts	August 25, 2009
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Defendant's Rule 26(a)(2) disclosures re experts	September 22, 2009
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Plaintiff's rebuttal Rule 26(a)(2) disclosures re experts	October 6, 2009
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Rule 26(e)(2) supplementation of disclosures and responses	October 13, 2009
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Discovery deadline; submission of status report	January 10, 2010
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Requests for admission	January 17, 2010
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**Dispositive pretrial
motions deadline**

February 12, 2010

Pretrial Conference

To Be Set At Later Date

Stephen H. Ring, P.C.

Greenberg Traurig, LLP

_____/s/_____
Stephen H. Ring
(signed by Sanford M. Saunders, Jr.
With the permission of Stephen H. Ring.)

_____/s/_____
Sanford M. Saunders, Jr.
Nicoleta Burlacu (pro hac vice)

20300 Seneca Meadows Parkway,
Suite 200, Germantown, Maryland 20876
301 540 8180 (telephone)
301 540 8195 (facsimile)
USDC# 00405

2101 L Street, Suite 1000
Washington, DC, 20037
202 331 3120 (telephone)
202 331 3101 (facsimile)
USDC #4734

Attorney for Beyond Systems, Inc.

Attorney for World Avenue USA, LLC

Dated: May 5, 2009